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City of Wilmington Audit Committee Meeting October 16, 2008 10:30 AM

City Manager's Conference Room Subject: Consideration of Red Flag Policy

<u>Agenda</u>

Attendees:

Sterling Cheatham Kristi Tomey Jason Thompson Ronald Sparks Debra Mack Gene Meadows Allison Collins

Red Flag Rules – Identity Theft Act: (Currently on October 21, 2008 City Council Agenda)
The City of Wilmington must meet Red Flag Rules Requirements by the effective date of November 1, 2008.

I. Procedures:

- Reviewed the credit card processing procedures for the following departments for City of Wilmington:
 - i. Parks & Recreation Department including the following facilities:
 - 1. Docking Services
 - 2. Halyburton Park
 - 3. Golf Course.
 - ii. Finance Departments Loan Processing Division

II. Issues:

- City-Wide:
 - Sensitive Data (credit card account number, expiration date, security code, loan processing data including social security number, date of birth, direct contact information) is not being maintained in a secure location to ensure the data is protected.
 - ii. This increases the risk for the data to be stolen for reasons of identity theft and/or fraud or abuse.

III. Recommendations:

- i. The city needs to implement additional measures to strengthen controls to prevent and deter identity theft.
- ii. Recommend city-wide implementation and utilization of the HTE (AS400) Cash Receipts Module at all locations that accept payments.
- iii. Ensure all sensitive data is maintained in a secure ("locked") area to mitigate the risk of identity theft if the HTE Cash Receipts Module is not being utilized at the facility.
 - Auditor Note: "locked" area includes a locked filing cabinet, locked safe or an office that is locked; all of these areas should also maintain limited access by employee's and citizens of the City of Wilmington

Audit Committee Comments and Pending Approval of Red Flag Rules – Identity Theft Report completed by City of Wilmington City Auditor on October 2, 2008

*Additional Auditor Notes: Currently working on a Fraud Policy & Audit Hotline Policy for the City of Wilmington.